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July 28, 2022

VIA ECF

United States District Court
Eastern District of New York
Attn: Hon. Sanket J. Bulsara, U.S.M.J.
225 Cadman Plaza East
Courtroom 324N
Brooklyn, NY 11201-1804

Re: Fidan, et ano. v. Istanbul Rego Park Inc., et al.
Case No.: 1:22-cv-2252 (ENV) (SJB)
MLLG File No.: 101-2022

Dear Judge Bulsara:

This office represents the Defendants in the above-referenced case. Defendants write, with Plaintiff's consent, to respectfully request a two (2) week extension of time to respond to the complaint in this case.

Pursuant to ¶ II(A) of this Court's Individual Practices, Defendants submit that: (i) the original date to respond to the complaint is unknown as no affidavit of service has been filed on the docket; (ii) the reason for the requested extension is because your undersigned needs additional time to investigate the allegations; and (iii) the Plaintiffs consent to this motion and also join in a request for a mediation referral Order.

Accordingly, Defendants respectfully submit that there is good cause for the requested extension of time. See Fed. R. Civ. P. 6(b)(1)(A). Defendants thank this Court for its time, attention, and continued courtesies in this case.

Dated: Lake Success, New York

July 28, 2022

Respectfully submitted,

MILMAN LABUDA LAW GROUP PLLC

/s/ Emanuel Kataev, Esq.

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